

2311 Douglas Street  
Omaha, Nebraska 68102-1214

1-800-225-6964  
(402) 342-2831  
Fax: (402) 342-4850



E-Mail Address:  
contact@cocklelegalbriefs.com

Web Site  
www.cocklelegalbriefs.com

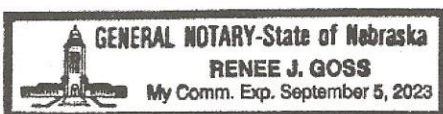
No. 21-264

COUNTY OF SAN DIEGO et al.,  
Petitioners,  
v.  
ANA SANDOVAL,  
Respondent.

### **CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1(h), I certify that the BRIEF OF THE CALIFORNIA STATE ASSOCIATION OF COUNTIES, THE NATIONAL SHERIFFS' ASSOCIATION, THE CALIFORNIA STATE SHERIFFS' ASSOCIATION, THE CALIFORNIA POLICE CHIEFS ASSOCIATION, AND THE CALIFORNIA PEACE OFFICERS' ASSOCIATION AS AMICI CURIAE IN SUPPORT OF PETITIONERS in the above entitled case complies with the typeface requirement of Supreme Court Rule 33.1(b), being prepared in New Century Schoolbook 12 point for the text and 10 point for the footnotes, and this brief contains 5318 words, excluding the parts that are exempted by Supreme Court Rule 33.1(d), as needed.

Subscribed and sworn to before me this 23rd day of September, 2021.  
I am duly authorized under the laws of the State of Nebraska to administer oaths.



*Renee J. Goss*  
Notary Public

*Andrew H. Cockle*  
Affiant